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and the Proposed Class*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

19 JEREMY STANFIELD, on behalf of himself
20 and all others similarly situated,

21 Plaintiff,

22 v.

23 TAWKIFY, INC., et al.; and DOES 1-25,

24 Defendants.

25 Case No. 3:20-cv-07000-WHA

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28 **PLAINTIFF'S SUPPLEMENTAL
RESPONSES TO DEFENDANT TAWKIFY,
INC.'S INTERROGATORIES TO
PLAINTIFF, SET ONE, NOS. 2, 3, 8, 9, 10,
11, 13, AND 18**

Complaint filed: August 21, 2020
Trial date:

8. Plaintiff objects to each interrogatory to the extent it seeks information from or about anyone besides the named Plaintiff, thereby seeking documents that may not in the possession, custody or control of Plaintiff.

9. Plaintiff objects to each interrogatory to the extent that it is vague, ambiguous, overbroad, and unintelligible.

10. Plaintiff objects to each interrogatory to the extent it seeks information protected from disclosure under the marital testimonial privilege and/or the marital confidential communications privilege.

Plaintiff specifically reserves the right to supplement these objections and responses as discovery progresses, and specifically after and if Plaintiff is able to obtain further documents, discovery responses, and deposition testimony from Defendant.

Subject to and without waiving the foregoing General Objections, and incorporating each of them by reference into each of the responses provided below, Plaintiff hereby responds to Defendant Tawkify, Inc.’s Interrogatories to Plaintiffs, Set One, as follows:

INTERROGATORIES

INTERROGATORY NO. 2:

IDENTIFY, with specificity, all facts, including the relevant dates, PERSONS, COMMUNICATIONS, and DOCUMENTS, that relate to how YOU first became aware of the Dating Services Contract Act, Cal. Civ. Code section 1694, et seq. (“DSCA” or the “Act”).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:

Plaintiff objects to the interrogatory on grounds that it is compound. Plaintiff objects to the interrogatory to the extent it seeks information protected by the attorney-client privilege or the attorney work product doctrine. Plaintiff objects that the interrogatory is overbroad, vague, and ambiguous. Plaintiff objects that the interrogatory incorporates terms that are vague, unintelligible, or misleading. Plaintiff objects that the interrogatory is unduly burdensome and propounded for the purpose of harassing Plaintiff because it seeks information in the possession of, known to, or otherwise equally available to, Defendant.

1 Subject to the foregoing objections, Plaintiff responds as follows:

2 Plaintiff became aware of the Dating Services Contract Act shortly before filing the
3 complaint in August 2020, on or about August 7, 2020.

4 **INTERROGATORY NO. 3**

5 IDENTIFY the date that YOU first learned of YOUR rights under California Civil Code §
6 1694.1, as alleged in the FAC.

7 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:**

8 Plaintiff objects to the interrogatory on grounds that it is compound. Plaintiff objects that
9 the interrogatory is overbroad, vague, and ambiguous. Plaintiff objects to the interrogatory on
10 grounds that it seeks information protected by the attorney-client privilege. Plaintiff objects on
11 grounds that the information sought is not relevant nor reasonably calculated to lead to the
12 discovery of admissible evidence.

13 Subject to the foregoing objections, Plaintiff responds as follows:

14 Plaintiff became aware of the Dating Services Contract Act shortly before filing the
15 complaint in August 2020, including those rights enumerated in California Civil Code § 1694.1,
16 on or about August 7, 2020.

17 **INTERROGATORY NO. 8**

18 IDENTIFY all PERSONS (other than YOUR counsel or YOUR counsel's staff) who have
19 personal knowledge concerning the facts alleged in the FAC.

20 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8:**

21 Plaintiff objects that interrogatory is vague and overbroad. Plaintiff objects to the
22 interrogatory on grounds that it requires him to speculate about the personal knowledge of
23 individuals. Plaintiff objects that the interrogatory is unduly burdensome and propounded for the
24 purpose of harassing Plaintiff because it seeks information in the possession of, known to, or
25 otherwise equally available to, Defendant.

26 Subject to and without waiving the foregoing objection(s), Plaintiff responds as follows:

27 • Plaintiff, who may be contacted through counsel;

1 Subject to and without waiving the foregoing objection(s), and subject to the Preliminary
2 Statement and General Objections above, Plaintiff responds as follows: Plaintiff has not shared
3 his “TAWKIFY profile login information (username and password)” with any person outside of a
4 privileged attorney-client relationship.

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Respectfully submitted,

6 Dated: June 4, 2021

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OLIVIER SCHREIBER & CHAO LLP
8 CONN LAW, PC

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By: /s/ Christian Schreiber
10 Christian Schreiber

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Attorneys for Plaintiff and the Proposed Class

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VERIFICATION

I, Jeremy Stanfield, declare as follows:

I am the plaintiff in this action and have read the foregoing responses to Defendant Tawkify, Inc.'s Interrogatories, Set One (as modified), and know the contents thereof. The responses are true of my own knowledge except for matters stated on my information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Murrieta, California on June 04, 2021.

DocuSigned by:
 Jeremy Stanfield
9848E7011765402
Jeremy Stanfield

VERIFICATION
CASE NO: 3:20-cv-07000-WHA